

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	*	CHAPTER 13
MICHAEL WOODS	*	BANKRUPTCY NO. 18-17712
	*	
Debtor	*	

**ORDER**

AND NOW, this        day of        , 201 , upon  
consideration of ACAR Leasing d/b/a GM Financial Leasing's Motion  
for Relief from the Automatic Stay and Debtors' answer thereto,  
and after hearing, it is hereby ORDERED and DECREED that;

The Motion of ACAR Leasing d/b/a GM Financial Leasing for  
Relief From The Automatic Stay Under Section 362 is DENIED.

BY THE COURT:

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J.

Kenneth G. Harrison, Esquire  
Fine Neshaminy Interplex Suite 115  
Trevose, PA 19053

William C. Miller, Esquire (Trustee)  
P.O. Box 40119  
Philadelphia, PA 19106

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110 Marter Avenue  
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Moorestown, NJ 08057

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**DEBTOR'S ANSWER TO THE MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

Debtors, Michael Woods, by and through his attorney, Kenneth G. Harrison, Esquire, respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The October 27, 2018 payment is a pre-petition debt and Movant has filed a proof of claim in the amount of \$531.11. In addition, Debtor has made post-petition payments in the amount of \$1,500.00.
5. Denied as a conclusion of law upon which no responsive pleading is required.

DEFENSES

1. Movant has been afforded adequate protection of its interest.
2. Movant has not shown the irreparable harm necessary to justify lifting of the automatic stay with respect to its foreclosure.
3. If movant is entitled to relief from the stay, the stay should not be terminated and the Court should grant less drastic relief by conditioning or modifying the stay.

WHEREFORE, Debtor, Michael Woods, respectfully requests that this Honorable Court deny Movant's Motion for Relief From the Automatic Stay.

Respectfully submitted,

s/s Kenneth G. Harrison  
Kenneth G. Harrison, Esquire  
Five Neshaminy Interplex Suite 115  
Trevose, PA 19053